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To: [BAYUK Dana](#)
Cc: [Lance Peterson \(PetersonLE@cdmsmith.com\)](mailto:Lance.Peterson@cdmsmith.com)
Subject: gasco BOD workplan comment set waste handling questions (sf)
Date: Wednesday, October 04, 2017 12:39:57 PM
Attachments: [image007.png](#)
[image008.png](#)
[image009.png](#)

Hi Dana,

I just wanted to let you know we're thinking of adding a couple notes to the comments below in the comment set and wanted to see if DEQ had any objections/changes?

Thank you and hope you're enjoying some sunshine today like we are up in Seattle.

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19. Section 4.5 Dredge Sediment Waste Handling and Transport Evaluation, page 44-46: A materials management plan (MMP) should be identified in the Work Plan and incorporated into the remedial design for the Final Project Area. The MMP should include:

- a. Means and methods, including recordkeeping, to demonstrate compliance with substantive requirements of ARARs identified in Table 1 for waste handling work conducted within the Portland Harbor Superfund Site
- b. Means and methods, including recordkeeping, to demonstrate compliance with substantive and administrative requirements of applicable Federal, state and local laws and regulations for work conducted offsite, including transload, transport, and waste disposal outside of the Portland Harbor Superfund Site
- c. Organizational structure of waste management activities
- d. Other activities associated with handling, transport, and disposal of waste, which have been described in the Basis of Design (BOD) and not specifically identified in this comment

Thinking of adding a contained in determination here to address Siltronic's allegations that d/f in this area is listed (but then they also cast doubt on what process it came from)

Section 4.6.2 Material Disposal Testing Evaluations, pages 47-49: The discussion implies that F-listed hazardous waste is identified based on contaminant concentrations. However, per Resource Conservation Recovery Act (RCRA) F-listed hazardous waste is identified based on the wastes originating from non-specific sources. The process of identifying F-listed wastes needs to be revised to conform with the substantive requirements of RCRA as indicated at 40 Code of Federal Regulations (CFR) 261.

For this one we'll probably add more detail on what cfr261 entails and how that satisfies a contained in determination.

26. **Section 4.6.3 Dredge Material Testing Framework, page 49:** The discussion implies that toxic contaminant leaching protocol (TCLP) sampling will be the primary differentiator for determination of material classifications. However, this process does not address all ARAR-related considerations for waste classification. For instance, extremely high pH (which could occur from excessive quicklime treatment) could result in characteristic hazardous waste. Another example is F-listed waste, which stays listed regardless of TCLP concentrations except under specific circumstances. The testing framework should be revised to account for all waste characterization requirements under ARARs and disposal facility waste acceptance requirements.

Thinking of adding a more explicit contained in aspect to this comment.

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